

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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JUL 14 1995  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
End User Common Line ) CC Docket No. 95-72  
Charges )

REPLY COMMENTS OF THE COMMERCIAL INTERNET  
EXCHANGE ASSOCIATION DOCKET FILE COPY ORIGINAL

The Commercial Internet eXchange Association ("CIX"), by its attorneys, respectfully submits these reply comments in response to the comments filed in this proceeding.

Consistent with the majority of commenters adopting a proposal, CIX supports a SLC charge on LEC ISDN service using the "per-facilities" approach as outlined in paragraphs 24 through 26 of the Notice of Proposed Rulemaking. Alternatively, several commenters propose a slightly different version of the "per-facilities" approach which would impose one SLC for each copper pair to the end user. See, e.g., Comments of Tele-Communications Association. While it favors the "per-facilities" approach, CIX believes this latter approach is also far better than the other alternatives suggested in the NPRM.

The "per-facilities" and "per copper pair" approaches minimize the deleterious impact of SLC charges on the deployment of ISDN. Parties from all sides endorsed these approaches, including industry leaders such as Pacific Bell and Nevada Bell, MCI, Microsoft, Time Warner, GTE, America OnLine, Compuserve, Prodigy, and GE Information Services. Industry trade associations, such as the USTA, ITIC, NTCA, CMA, and API also support these alternatives. Finally, these proposal gained support even from non-industry commenters with public interest objectives, such as the Center for Democracy and Technology and the Tennessee Public Service Commission. Even commenters that did not explicitly support a particular alternative expressed

concern that the Commission not allow SLC charges to impede the implementation of ISDN. See, e.g., Comments of West Virginia University; Comments of National Public Radio, Inc.

CIX also notes that, to its knowledge, none of the commenters endorsed the Commission's approach of charging one SLC for each derived channel.

CIX urges the Commission not to adopt a SLC approach that impedes the growth of LEC-provided ISDN service. Among the options proposed, CIX concludes that a "per-facilities" approach or hybrid "per copper pair" approach is the best solution until the broader issue of comprehensive access charge reform can be addressed.

Respectfully submitted,

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Certificate of Service

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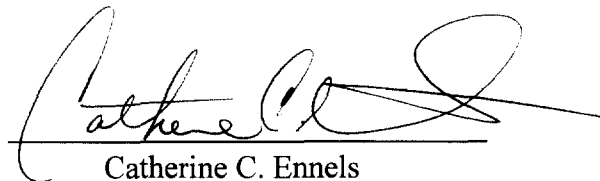
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